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January 21, 2003

Ms. Rebecca Kane
Environmental Protection Agency
Office of Enforcement and Compliance, MC 2222A
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Ms. Kane,

I am writing on behalf of Citizens Funds, one of America's largest families of socially responsible mutual funds. Since 1982, Citizens has been a leader in the growing social investment community. In selecting companies for investment, we examine all factors – financial, environmental, and social – that we believe affect a company's performance over time. Citizens has long believed that social responsibility can be a fundamental indicator of long-term company performance.

Director of Social Research

We would like to convey our support for your efforts to make information available through the Enforcement and Compliance History Online (ECHO) program. In response to your specific questions: 1) we find the ECHO site easy to navigate; 2) the help text adequately explains the data; and 3) the facility-level enforcement and compliance information is useful.

However, we do have some suggestions for improvement. Additional content would improve the site, most notably the businesses that own each facility should be identified. Tying regulated facilities to their corporate owners would enable the public, peer companies and investors like Citizens to more accurately assess environmental performance. To be truly useful, ECHO should provide company-level enforcement and compliance information.

Director of Social Research

We congratulate you on your hard work in developing ECHO and urge you to continue to make it available to the public. We hope our comments will be incorporated in future improvements.

Sincerely,

Diane Tod South

Diane Tod South
Director of Social Research

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